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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**In re: 23andMe, Inc. Customer
Data Security Breach Litigation**

Case No. 3:24-md-3098-EMC

**Plaintiff Ioffe's Response in Support
of Appointment of SSL Slate as
Interim Co-Lead Counsel**

Pursuant to Pretrial Order No. 1, plaintiff Paulina Ioffe in *Ioffe v. 23andMe, Inc.*, No. 3:23-cv-06205 (N.D. Cal.) submits this response in support of the appointment of Norman E. Siegel, Sabita S. Soneji, and Cari Campen Laufenberg ("the SSL Slate") as Interim Co-Lead Counsel. For the reasons stated in their Joint Response Memorandum (ECF 23), counsel for plaintiff Ioffe believes that the the SSL Slate is best suited to lead this important litigation.¹

Since the filing of plaintiff Ioffe's complaint last November, plaintiff's counsel has kept apprised of developments in this litigation, attended the first mediation via Zoom, and has regularly kept in contact with many of the other plaintiffs' counsel regarding the progress of

¹ Neither Plaintiff Ioffe or her counsel has been offered or promised anything by the SSL Slate or its members in exchange for her support. She simply believes they would best represent the class.

1 settlement negotiations. However, plaintiff’s counsel decided not to submit an application for
 2 leadership herself. Rather, in light of the efforts made toward resolution of this litigation, plaintiff
 3 Ioffe believes this case needs a small, cohesive, and exceptionally well-qualified group of data-
 4 breach attorneys to steer the ship. That is the SSL Slate.

5 In particular, plaintiff’s counsel has worked collaboratively with Ms. Soneji in many other
 6 data-breach cases, including *In re LastPass Data Security Incident Litigation*, No. 22-cv-12047-PBS
 7 (D. Mass.) (breach of 33 million users’ password vaults), and *Skurauskis v. NationsBenefits*
 8 *Holdings, LLC*, No. 23-cv-60830- RAR (S.D. Fla.) (breach of 3 million health-insurance
 9 subscribers’ records as part of larger *Fortra* MDL). Ms. Soneji is extraordinarily smart and
 10 strategic and consistently delivers excellent results for data-breach victims. She also works well
 11 with everyone. Additionally, Mr. Siegel is a tenacious negotiator who is perfectly suited to
 12 maximize any class recovery as Settlement Counsel. They complement each other well.²

13 Importantly, the appointment of the SSL Slate reflects the diversity of the Bar and the
 14 putative classes, including across age, gender, racial background, and experience. As the Duke
 15 Guidelines note, there is a substantial benefit in increasing opportunities for qualified diverse and
 16 younger attorneys in class action litigation, as it “will improve the likelihood of consideration of
 17 diverse ideas and perspectives.” Bolch Judicial Institute, Duke Law School, *Guidelines and Best*
 18 *Practices for Large and Mass Tort MDLs*, at 45 (Best Practice 4H) (2d ed., Sept. 2018), available at
 19 <https://scholarship.law.duke.edu/bolch/5/>; see also *In re Robinhood Outage Litig.*, 2020 WL
 20 7330596 (N.D. Cal. July 14, 2020) (rejecting proposed lead counsel team consisting only of men,
 21 given its “concern[] about a lack of diversity”); *Sayce v. Forescout Techs., Inc.*, 2020 WL 6802469
 22 (N.D. Cal. Nov. 19, 2020) (noting the “apparent lack of diversity, including by female lawyers”
 23 among co-lead counsel and “strongly urg[ing]” all parties to give meaningful opportunities to
 24 “lawyers from groups that have been historically underrepresented in the legal profession”).

25 For these reasons, plaintiff Ioffe supports the appointment of Mr. Siegel, Ms. Soneji, and
 26 Ms. Laufenberg as Interim Co-Lead Counsel.

27
 28 ² Although plaintiff’s counsel has not yet had the opportunity to work with Ms. Laufenberg, her
 record in privacy and data-breach litigation speaks for itself.

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2 /s/ Amber L. Schubert

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